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6 Attorneys for Michael A. McConnell,
Chapter 11 Trustee
7

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **NORTHERN DIVISION**

11 In re
12 HVI CAT CANYON, INC.,
13 Debtor.

Case No. 9:19-bk-11573-MB

Chapter 11

**STIPULATION TO DISMISS REQUEST
FOR PAYMENT OF ADMINISTRATIVE
RENT FILED BY GLR, LLC [DOC NO.
801]**

Date: March 12, 2020
Time: 10:00 a.m.
Crtrm.: 201
1415 State Street
Santa Barbara, CA 93101

19 Movant GLR, LLC ("Movant" or "GLR"), on the one hand, and Respondents Michael A.
20 McConnell, as Chapter 11 Trustee (the "Trustee"), UBS AG, London Branch and UBS AG,
21 Stamford Branch ("UBS"), and the California State Lands Commission (the "Commission")
22 (collectively, "Respondents"), on the other hand, hereby stipulate as follows:
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24 **RECITALS**

25 1. On February 14, 2020, Movant filed its *Request for Payment of Administrative Rent*
26 (doc. no. 801) together with a request for judicial notice (doc. no. 802) and notice of hearing (doc.
27 no. 803) (taken together, the "Motion").

28 2. UBS filed an opposition to the Motion (doc. no. 829).

8 5. The Movant and Respondents have agreed, subject to execution of this stipulation
9 and Court approval, to Movant's withdrawal of the Motion and to dismissal of the Motion pursuant
10 to Local Bankruptcy Rule 9013-1(k).

6. The above recitals are incorporated herein by this reference.

8. The Trustee agrees to continue to maintain \$52,500 in escrow on account of the Lakeview Lease pending further order of this Court expressly authorizing the disposition of such funds.

20
21 DATED: March 4, 2020

By:

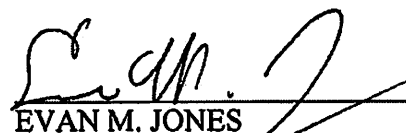
ZEV SHECHTMAN

[Signatures Continued On Next Page]

1 DATED: March 4, 2020

O'MELVENY & MYERS LLP

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3 By:



4 EVAN M. JONES
5 Attorneys for UBS AG, London Branch
and UBS AG, Stamford Branch

6 DATED: March __, 2020

LOEB & LOEB LLP

7
8
9 By:



10 MARC S. COHEN
11 Attorneys for the California State Lands
Commission

12 DATED: March __, 2020

BEALL & BURKHARDT, APC

13
14 By:

15 WILLIAM C. BEALL
16 Attorneys for GLR, LLC
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1 DATED: March __, 2020

O'MELVENY & MYERS LLP

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By:

4

EVAN M. JONES

5

Attorneys for UBS AG, London Branch
and UBS AG, Stamford Branch

6

DATED: March __, 2020

LOEB & LOEB LLP

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By:

10

MARC S. COHEN

Attorneys for the California State Lands
Commission

11

DATED: March 4, 2020

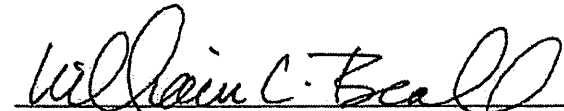
BEALL & BURKHARDT, APC

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By:



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WILLIAM C. BEALL

Attorneys for GLR, LLC

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1901 Avenue of the Stars, Suite 450, Los Angeles, CA 90067-6006.

A true and correct copy of the foregoing document entitled (*specify*): STIPULATION TO DISMISS REQUEST FOR PAYMENT OF ADMINISTRATIVE RENT FILED BY GLR, LLC [DOC NO. 801] will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) March 4, 2020 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL:

On (date) March 4, 2020, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) March 4, 2020, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

PERSONAL DELIVERY ALSSI – TO BE DELIVERED BY 3/5/20
The Honorable Martin R. Barash
U.S. Bankruptcy Court
Bin on 1st Floor outside entry to Intake Section
21041 Burbank Blvd.
Woodland Hills, CA 91367

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

March 4, 2020
Date

Gloria Ramos
Printed Name

/S/ GLORIA RAMOS
Signature

ADDITIONAL SERVICE INFORMATION (if needed):

1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")

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2. SERVED BY U.S. MAIL

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San Luis Obispo, CA 93405-7836